QUALCOMM INCORPORATED,)
a Delaware corporation; and)
QUALCOMM TECHNOLOGIES, INC.,)
a Delaware corporation,)
•) C.A. No. 24-490 (MN)
Plaintiffs,)
•)
V.)
)
ARM HOLDINGS PLC., f/k/a ARM LTD., a U.K. corporation,) REDACTED PUBLIC VERSION
Defendant.)

PLAINTIFFS' CONCISE STATEMENT OF FACTS IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT UNDER NOERR-PENNINGTON AND FOR LACK OF CAUSATION WITH RESPECT TO QUALCOMM'S GOOD FAITH AND FAIR DEALING, TORTIOUS INTERFERENCE, AND UCL CLAIMS (COUNTS III-VI); AND FOR PARTIAL SUMMARY JUDGMENT ON QUALCOMM'S BREACH OF THE IMPLIED COVENANT OF GOOD FAITH AND FAIR **DEALING (COUNT III)**

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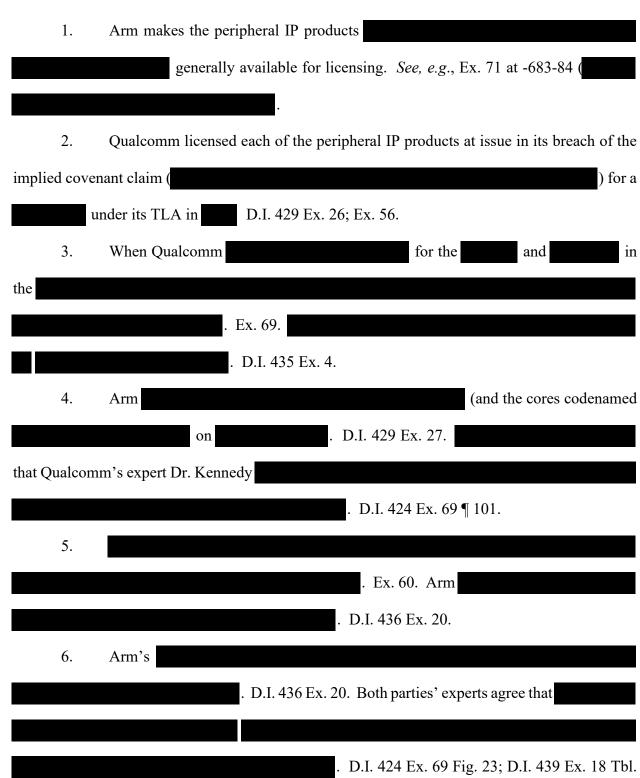
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I. ARM'S REFUSAL TO REASONABLY OFFER PERIPHERAL IP



8.

II. ARM'S LEAKS OF CONFIDENTIAL INFORMATION¹

7. Arm's October 22 letter stated that Qualcomm's "obligations are reflected in	in
multiple places in the Qualcomm ALA, including but not limited to Sections	
D.I. 423 Ex. 4. Arm's letter also asserted that Qualcomm mus	st
Id. Arm	I.
421¶3.	
8. Arm stipulated in the Arm Action that the chair of its Board told	
executives about a term of the ALA (its duration) in 2022, representing that Qualcomm's ALA	A
would expire in 2025. Ex. 72, Arm Action, D.I. 518-1 at ¶ 13. Qualcomm's license does no	ot
expire in 2025. Ex. 68 at 345:22-346:24 (Haas Trial Tr.); D.I. 428 Ex. 2	
III. QUALCOMM'S CUSTOMERS' CONCERNS ABOUT THE OCT. 22 LETTER	
9.	
Ex. 73.	
10.	
	_

¹ Arm's leak of the October 22 letter is discussed further in Qualcomm's Concise Statement of Facts in Opposition to Arm's Motion for Summary Judgment on its UCL claim.

D.I. 424 Ex. 25 at -475; D.I. 421 ¶ 18.

- 11. Qualcomm's Senior Director of Sales and Business Development Pavan Mulabagal, part of the negotiation team, testified that

 Ex. 75 at 41:12-44:14, 49:6-11, 53:20-55:12.

 12.

 13.
- 15. Numerous Qualcomm customers reached out with concerns about Qualcomm's ability to provide products in light of Arm's leak of the October 22 letter. *See, e.g.*, Ex. 77; Ex. 78; Ex. 79; Ex. 80; Ex. 81. Qualcomm employees spent time trying to assuage these concerns and attempting to mitigate the harm on Qualcomm's business. Ex. 82 at 14:1-15:18, 20:21-23:1, 52:9-56:14, 69:22-72:21, 86:14-89:3, 98:23-100:9 (Jeon); D.I. 423 Ex. 14 at 41:9-43:12, 45:9-18, 53:16-55:14, 107:1-108:19, 119:13-120:15, 157:23-158:4, 287:4-8, 294:8-295:14 (Amon); Ex. 87 at 57:14-58:25 (Chaplin); Ex. 83 at 73:12-74:13, 75:25-76:8, 79:20-83:10, 91:13-92:6, 112:3-114:3 (Patrick).

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November 7, 2025

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on November 7, 2025, upon the following in the manner indicated:

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